



PENNSYLVANIA GAME COMMISSION

BUREAU OF WILDLIFE MANAGEMENT

2001 ELMERTON AVENUE HARRISBURG, PA 17110-9797 | (717) 787-5529

October 24, 2025

PGC ID Number: 202507160201

Paul Kanouff
Civil & Environmental Consultants, Inc.
4350 Northern Pike
Suite 141
Monroeville, Pennsylvania 15146
pskanouff@cecinc.com

Re: *Homer City Pipeline, LLC* – HCPP Pipeline
PNDI Receipt File: *project_receipt_hcpp_pipeline_823013_FINAL_3.pdf*
Blacklick, Burrell, and Center Townships, Indiana County, Pennsylvania

Dear Paul Kanouff,

Thank you for submitting Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Receipt *project_receipt_hcpp_pipeline_823013_FINAL_3.pdf* for review. The Pennsylvania Game Commission (PGC) screened this project for potential impacts to species and resources of concern under PGC responsibility, which includes birds and mammals only.

Potential Impact Anticipated

PNDI records indicate species or resources of concern are located in the vicinity of the project. The PGC has received and thoroughly reviewed the information that you provided to this office, as well as PNDI data, and has determined that potential impacts to the following threatened, endangered, or species of special concern may be associated with your project. Therefore, additional measures are necessary to avoid potential impacts to the species listed below:

Common Name	Scientific Name	PA Status
Eastern Small-footed Bat	<i>Myotis leibii</i>	THREATENED
Little Brown Bat	<i>Myotis lucifugus</i>	ENDANGERED

Next Steps

Eastern Small-footed Bats and Little Brown Bats: A Habitat Suitability Assessment (HSA) for summer and winter Eastern Small-footed Bat potential Habitat was performed by Pittsburgh Wildlife & Environmental, Inc. (PWE) in August of 2025 within the project area and a quarter-mile buffer (where survey permission was granted). A report of results, dated August 22, 2025 was uploaded to the PA Conservation Explorer (PACE) on September 3, 2025.

No surface rock features meeting criteria of potential summer maternity roost habitat for Eastern Small-footed Bats were found during desktop review and field observations. Twenty (20) areas meeting criteria for potential

winter bat habitat were identified during a desktop review, including two (2) features within the project limits-of-disturbance (LOD). However, all features were determined to have been reclaimed, collapsed, or otherwise removed from the landscape. Therefore, no mitigation for Eastern Small-footed Bat maternity areas or winter hibernacula will be required for this project.

However, **Eastern Small-footed Bats** were documented in the project area during mist-net surveys conducted by PWE between August 4, 2025 – August 11, 2025, including capture of seven (7) individual bats of this species. Three (3) reproductive female **Eastern Small-footed Bats** were tracked via telemetry to a maternity roost site in a bridge outside of the LOD of the project. In addition, **Little Brown Bats** have been previously documented in the vicinity of the project area during surveys unrelated to the HCPP Pipeline project.

Therefore, to avoid potential impacts to **Eastern Small-footed Bats** and **Little Brown Bats**, all trees or dead snags greater than 3 inches in diameter at breast height that need to be harvested or trimmed to facilitate the project are to be cut between November 16 and March 31.

In addition, portions of the proposed project are located on **State Game Lands No. 2411** within the PGC’s Southwest (SW) region. Please contact Matthew Lucas, SW Land Management Supervisor at 724-238-9523 to discuss the project activities and coordinate obtaining the necessary approvals if your project will impact State Game Lands. It is recommended that you coordinate with Game Commission Staff early in your project planning process.

This response represents the most up-to-date summary of the PNDI data files and is valid for two (2) years from the date of this letter. An absence of recorded information does not necessarily imply actual conditions on site. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered.

Should the proposed work continue beyond the period covered by this letter, please resubmit the project to this agency as an “Update” (including an updated PNDI receipt, project narrative and accurate map). If the proposed work has not changed and no additional information concerning listed species is found, the project will be cleared for PNDI requirements under this agency for two additional years.

This finding applies to impacts to birds and mammals only. To complete your review of state and federally-listed threatened and endangered species and species of special concern, please be sure that the U.S. Fish and Wildlife Service, the PA Department of Conservation and Natural Resources, and/or the PA Fish and Boat Commission have been contacted regarding this project as directed by the online PNDI ER Tool found at www.naturalheritage.state.pa.us.

Please be sure to include the above-referenced PGC ID Number on any future correspondence with the PGC regarding this project.

Sincerely,



Amber Nolder
Wildlife Biologist
Bureau of Wildlife Management
Phone: 717-787-4250, Extension 73410

Fax: 717-787-6957

E-mail: anolder@pa.gov

A PNHP Partner



ADN/adn

cc: Schnupp
Lovallo
Turner
Farabaugh
Trusso
Lucas

H:\OIL&GAS_PNDI_Reviews\Southwest Region



PENNSYLVANIA GAME COMMISSION

BUREAU OF WILDLIFE MANAGEMENT

2001 ELMERTON AVENUE HARRISBURG, PA 17110-9797 | (717) 787-5529

December 23, 2025

PGC ID Number: 202507160201

Paul Kanouff
Civil & Environmental Consultants, Inc.
4350 Northern Pike
Suite 141
Monroeville, Pennsylvania 15146
pkanouff@cecinc.com

Re: *Homer City Pipeline, LLC* – HCPP Pipeline
PNDI Receipt File: *project_receipt_hcpp_pipeline_823013_FINAL_3.pdf*
Blacklick, Burrell, and Center Townships, Indiana County, Pennsylvania

Dear Paul Kanouff,

Thank you for submitting Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Receipt *project_receipt_hcpp_pipeline_823013_FINAL_3.pdf* for review. The Pennsylvania Game Commission (PGC) screened this project for potential impacts to species and resources of concern under PGC responsibility, which includes birds and mammals only.

This letter provides updates to the PGC response letter dated October 24, 2025.

Potential Impact Anticipated

PNDI records indicate species or resources of concern are located in the vicinity of the project. The PGC has received and thoroughly reviewed the information that you provided to this office, as well as PNDI data, and has determined that potential impacts to the following threatened, endangered, or species of special concern may be associated with your project. Therefore, additional measures are necessary to avoid potential impacts to the species listed below:

Common Name	Scientific Name	PA Status
Eastern Small-footed Bat	<i>Myotis leibii</i>	THREATENED
Little Brown Bat	<i>Myotis lucifugus</i>	ENDANGERED

Next Steps

Eastern Small-footed Bats and Little Brown Bats: A Habitat Suitability Assessment (HSA) for summer and winter Eastern Small-footed Bat potential Habitat was performed by Pittsburgh Wildlife & Environmental, Inc. (PWE) in August of 2025 within the project area and a quarter-mile buffer (where survey permission was granted). A report of results, dated August 22, 2025 was uploaded to the PA Conservation Explorer (PACE) on September 3, 2025.

No surface rock features meeting criteria of potential summer maternity roost habitat for Eastern Small-footed Bats were found during desktop review and field observations. Twenty (20) areas meeting criteria for potential winter bat habitat were identified during a desktop review, including two (2) features within the project limits-of-disturbance (LOD). However, all features were determined to have been reclaimed, collapsed, or otherwise removed from the landscape. Therefore, no mitigation for Eastern Small-footed Bat maternity areas or winter hibernacula will be required for this project.

However, **Eastern Small-footed Bats** were documented in the project area during mist-net surveys conducted by PWE between August 4, 2025 – August 11, 2025, including capture of seven (7) individual bats of this species. Three (3) reproductive female **Eastern Small-footed Bats** were tracked via telemetry to a maternity roost site in a bridge outside of the LOD of the project. **Little Brown Bats** have been previously documented in the vicinity of the project area during surveys unrelated to the HCPP Pipeline project. However, this species was not captured during the summer 2025 mist-net surveys.

To avoid potential impacts to **Eastern Small-footed Bats** and **Little Brown Bats**, the following measures are to be implemented:

- From the northern end of the project area (40.518890°N, 79.207580°W) south to McConnell Road (40.479484°N, 79.226783°W), all trees or dead snags greater than 3 inches in diameter at breast height that need to be harvested or trimmed are to be cut between November 16 and March 31.
- Within the remainder of the project area, tree clearing is to take place between October 16 and March 31.

In addition, portions of the proposed project are located on **State Game Lands No. 2411** within the PGC's Southwest (SW) region. Please contact Matthew Lucas, SW Land Management Supervisor at 724-238-9523 to discuss the project activities and coordinate obtaining the necessary approvals if your project will impact State Game Lands. It is recommended that you coordinate with Game Commission Staff early in your project planning process.

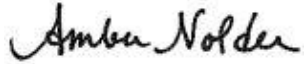
This response represents the most up-to-date summary of the PNDI data files and is valid for two (2) years from the date of this letter. An absence of recorded information does not necessarily imply actual conditions on site. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered.

Should the proposed work continue beyond the period covered by this letter, please resubmit the project to this agency as an "Update" (including an updated PNDI receipt, project narrative and accurate map). If the proposed work has not changed and no additional information concerning listed species is found, the project will be cleared for PNDI requirements under this agency for two additional years.

This finding applies to impacts to birds and mammals only. To complete your review of state and federally-listed threatened and endangered species and species of special concern, please be sure that the U.S. Fish and Wildlife Service, the PA Department of Conservation and Natural Resources, and/or the PA Fish and Boat Commission have been contacted regarding this project as directed by the online PNDI ER Tool found at www.naturalheritage.state.pa.us.

Please be sure to include the above-referenced PGC ID Number on any future correspondence with the PGC regarding this project.

Sincerely,



Amber Nolder
Wildlife Biologist
Bureau of Wildlife Management
Phone: 717-787-4250, Extension 73410
Fax: 717-787-6957
E-mail: anolder@pa.gov

A PNHP Partner



ADN/adn

cc: Schnupp
Lovallo
Turner
Farabaugh
Trusso
Lucas

H:\OIL&GAS_PNDI_Reviews\Southwest Region

Kanouff, Paul

From: Neil Bossart <nbossart@pwenv.com>
Sent: Wednesday, December 10, 2025 3:20 PM
To: Kanouff, Paul
Subject: FW: HCPP Pipeline , IPaC # 2025-0121413, PNDI #823013

Neil Bossart

Sent via Samsung S22 with very possible spelling and grammatical errors.

----- Original message -----

From: "Ernst, Emily E" <emily_ernst@fws.gov>
Date: 12/10/25 3:06 PM (GMT-05:00)
To: Neil Bossart <nbossart@pwenv.com>
Cc: anolder@pa.gov
Subject: HCPP Pipeline , IPaC # 2025-0121413, PNDI #823013

Hi Neil,

Thank you for submitting your bat survey report. The PA Field Office consider the results of your report valid. Your results indicate the probable absence of Indiana bats, northern long-eared bats, and tricolored bats. A state listed species was recorded during your survey, this finding may require additional coordination with the PA Game Commission.

When you complete the Northern Long-eared Bat and Tricolored Bat Rangewide Determination Key and the Northeast Endangered Species Determination Key you may indicate that you have completed coordination with your local Ecological Services Field Office.

If you have any further questions, please feel free to reach out.

Emily Ernst

Fish & Wildlife Biologist
U.S. Fish and Wildlife Service
Pennsylvania Field Office
110 Radnor Road, Suite 101
State College, PA 16801
814-206-7453

<https://www.fws.gov/office/pennsylvania-ecological-services>





United States Department of the Interior



FISH AND WILDLIFE SERVICE
Pennsylvania Ecological Services Field Office
110 Radnor Road Suite 101
State College, PA 16801-7987
Phone: (814) 234-4090 Fax: (814) 234-0748

In Reply Refer To:
Project Code: 2025-0121413
Project Name: HCPP Pipeline

12/11/2025 13:08:06 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

- USFWS National Wildlife Refuges and Fish Hatcheries

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Pennsylvania Ecological Services Field Office

110 Radnor Road Suite 101

State College, PA 16801-7987

(814) 234-4090

PROJECT SUMMARY

Project Code: 2025-0121413

Project Name: HCPP Pipeline

Project Type: Natural Gas Distribution

Project Description: The proposed pipeline will transport natural gas from an existing TETCO Transmission Line to the Homer City Power Plant.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@40.49672905,-79.2145582629606,14z>



Counties: Indiana County, Pennsylvania

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Civil & Environmental Consultants, Inc.

Name: Paul Kanouff

Address: 4350 Northern Pike, Suite 141

City: Monroeville

State: PA

Zip: 15146

Email: pkanouff@cecinc.com

Phone: 7243275200

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Army Corps of Engineers



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Pennsylvania Ecological Services Field Office
110 Radnor Road Suite 101
State College, PA 16801-7987
Phone: (814) 234-4090 Fax: (814) 234-0748

In Reply Refer To:
Project code: 2025-0121413
Project Name: HCPP Pipeline

12/11/2025 13:40:47 UTC

Federal Nexus: yes
Federal Action Agency (if applicable): Army Corps of Engineers

Subject: Technical assistance for 'HCPP Pipeline'

Dear Paul Kanouff:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on December 11, 2025, for 'HCPP Pipeline' (here forward, Project). This project has been assigned Project Code 2025-0121413 and all future correspondence should clearly reference this number. **Please carefully review this letter. Your Endangered Species Act (Act) requirements are not complete.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project. **Failure to accurately represent or implement the Project as detailed in IPaC or the Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (Dkey), invalidates this letter.**

Determination for the Northern Long-Eared Bat and Tricolored Bat

Based on your IPaC submission and a standing analysis completed by the Service, you determined the proposed Project will have the following effect determinations:

Species	Listing Status	Determination
Northern Long-eared Bat (<i>Myotis septentrionalis</i>)	Endangered	May affect
Tricolored Bat (<i>Perimyotis subflavus</i>)	Proposed	May affect
	Endangered	

Federal agencies must consult with U.S. Fish and Wildlife Service under section 7(a)(2) of the Endangered Species Act (ESA) when an action *may affect* a listed species. Tricolored bat is proposed for listing as endangered under the ESA, but not yet listed. For actions that may affect a proposed species, agencies cannot consult, but they can *confer* under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the tricolored bat be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the tricolored bat range that previously received a NE or NLAA determination from the key to confirm that the determination is still accurate. Projects that receive a may affect determination for tricolored bat through the key, should contact the appropriate Ecological Services Field Office if they want to conference on this species.

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the northern long-eared bat and tricolored bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Indiana Bat *Myotis sodalis* Endangered
- Monarch Butterfly *Danaus plexippus* Proposed Threatened

You may coordinate with our Office to determine whether the Action may cause prohibited take of the species listed above.

Conclusion

Consultation with the Service is not complete. Further consultation or coordination with the Service is necessary for those species or designated critical habitats with a determination of “May Affect.” A “May Affect” determination in this key indicates that the project, as entered, is not consistent with the questions in the key. Not all projects that reach a “May Affect” determination are anticipated to result in adverse impacts to listed species. These projects may result in a “No Effect”, “May Affect, Not Likely to Adversely Affect”, or “May Affect, Likely to Adversely Affect” determination depending on the details of the project. Please contact our Pennsylvania Ecological Services Field Office to discuss methods to avoid or minimize potential adverse effects to those species or designated critical habitats.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

HCPP Pipeline

2. Description

The following description was provided for the project 'HCPP Pipeline':

The proposed pipeline will transport natural gas from an existing TETCO Transmission Line to the Homer City Power Plant.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@40.49672905,-79.2145582629606,14z>



DETERMINATION KEY RESULT

Based on the answers provided, the proposed Action is consistent with a determination of “may affect” for a least one species covered by this determination key.

QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed bats or any other listed species?

Note: Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

No

2. Is the action area wholly within Zone 2 of the year-round active area for northern long-eared bat and/or tricolored bat?

Automatically answered

No

3. Does the action area intersect Zone 1 of the year-round active area for northern long-eared bat and/or tricolored bat?

Automatically answered

No

4. Does any component of the action involve leasing, construction or operation of wind turbines? Answer 'yes' if the activities considered are conducted with the intention of gathering survey information to inform the leasing, construction, or operation of wind turbines.

No

5. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

Note for projects in Pennsylvania: Projects requiring authorization under Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act would be considered as having a federal nexus. Since the U.S. Army Corps of Engineers (Corps) has issued the Pennsylvania State Programmatic General Permit (PASPGP), which may be verified by the PA Department of Environmental Protection or certain Conservation Districts, the need to receive a Corps authorization to perform the work under the PASPGP serves as a federal nexus. As such, if proposing to use the PASPGP, you would answer ‘yes’ to this question.

Yes

6. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) funding or authorizing the proposed action, in whole or in part?

No

7. Are you an employee of the federal action agency or have you been officially designated in writing by the agency as its designated non-federal representative for the purposes of Endangered Species Act Section 7 informal consultation per 50 CFR § 402.08?

Note: This key may be used for federal actions and for non-federal actions to facilitate section 7 consultation and to help determine whether an incidental take permit may be needed, respectively. This question is for information purposes only.

No

8. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)? Is the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC) funding or authorizing the proposed action, in whole or in part?

No

9. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

No

10. [Semantic] Is the action area located within 0.5 miles of a known bat hibernaculum or winter roost? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

Automatically answered

Yes

11. Does the action area contain any winter roosts or caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating bats?

No

12. Does the action area contain (1) talus or (2) anthropogenic or naturally formed rock shelters or crevices in rocky outcrops, rock faces or cliffs?

No

13. Will the action cause effects to a bridge?

Note: Covered bridges should be considered as bridges in this question.

No

14. Will the action result in effects to a culvert or tunnel at any time of year?

No

15. Are trees present within 1000 feet of the action area?

Note: If there are trees within the action area that are of a sufficient size to be potential roosts for bats answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

Yes

16. Does the action include the intentional exclusion of bats from a building or building-like structure? **Note:** Exclusion is conducted to deny bats' entry or reentry into a building. To be effective and to avoid harming bats, it should be done according to established standards. If your action includes bat exclusion and you are unsure whether northern long-eared bats or tricolored bats are present, answer "Yes." Answer "No" if there are no signs of bat use in the building/structure. If unsure, contact your local Ecological Services Field Office to help assess whether northern long-eared bats or tricolored bats may be present. Contact a Nuisance Wildlife Control Operator (NWCO) for help in how to exclude bats from a structure safely without causing harm to the bats (to find a NWCO certified in bat standards, search the Internet using the search term "National Wildlife Control Operators Association bats"). Also see the White-Nose Syndrome Response Team's guide for bat control in structures.

No

17. Does the action involve removal, modification, or maintenance of a human-made building-like structure (barn, house, or other building) **known or suspected to contain roosting bats?**

No

18. Will the action cause construction of one or more new roads open to the public?

For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

19. Will the action include or cause any construction or other activity that is reasonably certain to increase average night-time traffic permanently or temporarily on one or more existing roads? **Note:** For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.). .

No

20. Will the action include or cause any construction or other activity that is reasonably certain to increase the number of travel lanes on an existing thoroughfare?

For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

21. Will the proposed Action involve the creation of a new water-borne contaminant source (e.g., leachate pond, pits containing chemicals that are not NSF/ANSI 60 compliant)?

Note: For information regarding NSF/ANSI 60 please visit <https://www.nsf.org/knowledge-library/nsf-ansi-standard-60-drinking-water-treatment-chemicals-health-effects>

No

22. Will the proposed action involve the creation of a new point source discharge from a facility other than a water treatment plant or storm water system?

No

23. Will the action include drilling or blasting?

Yes

24. Will the drilling or blasting produce noise or vibrations above existing background levels that will affect suitable summer habitat for northern long-eared bats and/or tricolored bats?

Note: Additional information defining suitable suitable summer habitat for the northern long-eared bat and/or tricolored bat, can be found in Appendix A in the USFWS' Range-wide Indiana Bat and Northern long-eared Bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>

No

25. Will the action involve military training (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter or fixed wing aircraft use at night)?

No

26. Will the proposed action involve the use of herbicides or pesticides (e.g., fungicides, insecticides, or rodenticides)?

No

27. Will the action include or cause activities that are reasonably certain to cause chronic or intense nighttime noise (above current levels of ambient noise in the area) in suitable summer habitat for the northern long-eared bat or tricolored bat during the active season?

Chronic noise is noise that is continuous or occurs repeatedly again and again for a long time. Sources of chronic or intense noise that could cause adverse effects to bats may include, but are not limited to: road traffic; trains; aircraft; industrial activities; gas compressor stations; loud music; crowds; oil and gas extraction; construction; and mining.

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

No

28. Does the action include, or is it reasonably certain to cause, the use of permanent or temporary artificial lighting within 1000 feet of suitable northern long-eared bat or tricolored bat roosting habitat?

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

No

29. Will the action include tree cutting or other means of knocking down or bringing down trees, tree topping, or tree trimming?

Yes

30. Is the project related to the production of coal, including projects that support the mining of coal, as well as the production and/or distribution of energy produced from coal?

No

31. Will the proposed action occur exclusively in an already established and currently maintained utility right-of-way?

No

32. Does the action include emergency cutting or trimming of hazard trees in order to remove an imminent threat to human safety or property? See hazard tree note at the bottom of the key for text that will be added to response letters

Note: A "hazard tree" is a tree that is an immediate threat to lives, public health and safety, or improved property.

No

33. Does the project intersect with the 0- 9.9% forest density category?

Automatically answered

No

34. Does the project intersect with the 10.0- 19.9% forest density category map?

Automatically answered

No

35. Does the project intersect with the 20.0- 29.9% forest density category map?

Automatically answered

No

36. Does the project intersect with the 30.0- 100% forest density category map?

Automatically answered

Yes

37. Will the action cause trees to be cut, knocked down, or otherwise brought down across an area greater than 100 acres in total extent?

No

38. Will the proposed action result in the use of prescribed fire?

Note: If the prescribed fire action includes other activities than application of fire (e.g., tree cutting, fire line preparation) please consider impacts from those activities within the previous representative questions in the key. This set of questions only considers impacts from flame and smoke.

No

39. Does the action area intersect the northern long-eared bat species list area?

Automatically answered

Yes

40. [Semantic] Is the action area located within 0.5 miles of radius of an entrance/opening to any known NLEB hibernacula or winter roost? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

Automatically answered

Yes

41. Does the action area intersect the tricolored bat species list area?

Automatically answered

Yes

42. Is the action area located within 0.5-mile of radius of an entrance/opening to any known tricolored bat hibernacula or winter roost?

Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

Automatically answered

Yes

43. Do you have any documents that you want to include with this submission?

Yes

SUBMITTED DOCUMENTS

- *USFWS Concurrence Email to PWE_12102025.pdf* <https://ipac.ecosphere.fws.gov/project/ACTHF5VX5BGV7IFO5P42UFQH7I/projectDocuments/174033155>

PROJECT QUESTIONNAIRE

Enter the extent of the action area (in acres) from which trees will be removed - round up to the nearest tenth of an acre. For this question, include the entire area where tree removal will take place, even if some live or dead trees will be left standing.

24.9

IPAC USER CONTACT INFORMATION

Agency: Civil & Environmental Consultants, Inc.

Name: Paul Kanouff

Address: 4350 Northern Pike, Suite 141

City: Monroeville

State: PA

Zip: 15146

Email: pkanouff@cecinc.com

Phone: 7243275200

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Army Corps of Engineers



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Pennsylvania Ecological Services Field Office
110 Radnor Road Suite 101
State College, PA 16801-7987
Phone: (814) 234-4090 Fax: (814) 234-0748

In Reply Refer To:
Project code: 2025-0121413
Project Name: HCPP Pipeline

12/11/2025 13:23:45 UTC

Federal Nexus: yes
Federal Action Agency (if applicable): Army Corps of Engineers

Subject: Technical assistance for 'HCPP Pipeline'

Dear Paul Kanouff:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on December 11, 2025, for "HCPP Pipeline" (here forward, Project). This project has been assigned Project Code 2025-0121413 and all future correspondence should clearly reference this number.

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into the IPaC must accurately represent the full scope and details of the Project. Failure to accurately represent or implement the Project as detailed in IPaC or the Northeast Determination Key (Dkey), invalidates this letter. **Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.**

To make a no effect determination, the full scope of the proposed project implementation (action) should not have any effects (either positive or negative effect(s)), to a federally listed species or designated critical habitat. Effects of the action are all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (See § 402.17). Under Section 7 of the ESA, if a federal action agency makes a no effect determination, no further consultation with, or concurrence from, the Service is required (ESA §7). If a proposed Federal action may affect a listed species or designated critical habitat, formal consultation is required (except when the Service concurs, in writing, that a

proposed action "is not likely to adversely affect (NLAA)" listed species or designated critical habitat [50 CFR §402.02, 50 CFR§402.13]).

The IPaC results indicated the following species is (are) potentially present in your project area and, based on your responses to the Service's Northeast DKey, you determined the proposed Project will have the following effect determinations:

Species	Listing Status	Determination
Indiana Bat (<i>Myotis sodalis</i>)	Endangered	NLAA

Conclusion

Coordination with the Service is not complete. The project has a federal nexus (e.g., funds, permits); however, you are not the federal action agency. Therefore, the ESA consultation status is incomplete and no project activities on any portion of the parcel should occur until consultation between the Service and the Federal action agency (or designated non-federal representative), is completed. Section 7 consultation is not complete until the federal action agency submits a determination of effects, and the Service concurs with the federal action agency's determination. Please provide this technical assistance letter to the lead federal action agency or its designated non-federal representative with a request for its review. Determinations for proposed species are provided for informational purposes.

As the federal agency deems appropriate, they should submit their determination of effects to the appropriate Ecological Services Field Office. The lead federal action agency or designated non-federal representative can log into IPaC system using their agency email account and click "Search by record locator" to find this Project using 692-174033157.

Other Species and Critical Habitat that May be Present in the Action Area

In addition to the species listed above, the following species and/or critical habitats may also occur in your project area and are not covered by this conclusion:

- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Northern Long-eared Bat *Myotis septentrionalis* Endangered
- Tricolored Bat *Perimyotis subflavus* Proposed Endangered

If no changes occur with the Project or there are no updates on listed species, no further consultation/coordination for this project is required for the species identified above. However, the Service recommends that project proponents re-evaluate the Project in IPaC if: 1) the scope, timing, duration, or location of the Project changes (includes any project changes or amendments); 2) new information reveals the Project may impact (positively or negatively) federally listed species or designated critical habitat; or 3) a new species is listed, or critical habitat designated. If any of the above conditions occurs, additional consultation with the Service

should take place before project implements any changes which are final or commits additional resources.

Please Note: If the Action may impact bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act (BGEPA) (54 Stat. 250, as amended, 16 U.S.C. 668a-d) by the prospective permittee may be required. Please contact the Migratory Birds Permit Office, (413) 253-8643, or PermitsR5MB@fws.gov, with any questions regarding potential impacts to Eagles.

If you have any questions regarding this letter or need further assistance, please contact the Pennsylvania Ecological Services Field Office and reference the Project Code associated with this Project.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

HCPP Pipeline

2. Description

The following description was provided for the project 'HCPP Pipeline':

The proposed pipeline will transport natural gas from an existing TETCO Transmission Line to the Homer City Power Plant.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@40.49672905,-79.2145582629606,14z>



QUALIFICATION INTERVIEW

1. As a representative of this project, do you agree that all items submitted represent the complete scope of the project details and you will answer questions truthfully?

Yes

2. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed species?

Note: This question could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered, or proposed species.

No

3. Is the action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

Note: for projects in Pennsylvania: Projects requiring authorization under Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act would be considered as having a federal nexus. Since the U.S. Army Corps of Engineers (Corps) has issued the Pennsylvania State Programmatic General Permit (PASPGP), which may be verified by the PA Department of Environmental Protection or certain Conservation Districts, the need to receive a Corps authorization to perform the work under the PASPGP serves as a federal nexus. As such, if proposing to use the PASPGP, you would answer 'yes' to this question.

Yes

4. Are you including in this analysis all impacts to federally listed species that may result from the entirety of the project (not just the activities under federal jurisdiction)?

Note: If there are project activities that will impact listed species that are considered to be outside of the jurisdiction of the federal action agency submitting this key, contact your local Ecological Services Field Office to determine whether it is appropriate to use this key. If your Ecological Services Field Office agrees that impacts to listed species that are outside the federal action agency's jurisdiction will be addressed through a separate process, you can answer yes to this question and continue through the key.

Yes

5. Are you the lead federal action agency or designated non-federal representative requesting concurrence on behalf of the lead Federal Action Agency?

No

6. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)?

No

7. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

No

8. Is the lead federal action agency the Natural Resources Conservation Service?

No

9. Will the proposed project involve the use or storage of herbicide?

No

10. Will the proposed project involve herbaceous native vegetation removal (including prescribed fire that would result in burning of plants) or mowing?

Yes

11. Does any component of the project associated with this action include activities or structures that may pose a collision risk to **birds** (e.g., plane-based surveys, new or enlarged communication towers or broadcast towers, high voltage transmission lines, any type of towers with or without guy wires)?

No

12. Will the proposed project involve demolition, rehabilitation, property elevation, renovation, and/or rebuilding of one or more existing buildings (e.g., residential, commercial and industrial buildings, or utilities)? Note: if project activities include modification of bridges and/or culverts, answer this question "No".

No

13. Does the project area intersect the boundary of VAFO?

Automatically answered

No

14. Will the proposed project involve earth moving or other ground disturbance that could cause erosion and sedimentation, and/or contamination within 300 feet of a freshwater wetland or along a stream?

Note: Answer "Yes" to this question if erosion and sediment control measures will be used.

Yes

15. Will the proposed project impact streams or tributaries of streams where listed species may be present through activities such as, but not limited to, valley fills, large-scale vegetation removal that could result in ground destabilization, and/or change in site topography?

No

16. Will the proposed project involve vegetation removal within 300 feet of a perennial stream bank where aquatic listed species may be present?

Yes

17. Will erosion and sedimentation control Best Management Practices (BMPs) associated with applicable state and/or Federal permits, be applied to the project?

Note: If BMPs have been provided by and/or coordinated with and approved by the appropriate Ecological Services Field Office, answer "Yes" to this question.

Yes

18. Is the project being funded, lead, or managed in whole or in part by U.S Fish and Wildlife Restoration and Recovery Program (e.g., Partners, Coastal, Fisheries, Wildlife and Sport Fish Restoration, Refuges)?

No

19. Does the proposed project involve construction or installation of a non-commercial boat dock on a stream?

No

20. Does any component of the project associated with this action include activities or structures that may pose a collision risk to **bats** (e.g., plane-based surveys, land-based or offshore wind)?

No

21. Will the proposed project result in permanent changes to surface water or groundwater quantity, retention, quality or timing in areas where **bats** may be present?

No

22. Will the proposed project affect wetlands in areas where **bats** may be present?

Yes

23. Will the proposed project involve blasting where bats may be present?

No

24. Does the project intersect the Indiana bat species list area?

Automatically answered

Yes

25. Are there any caves, mines, or mine features that are suitable for hibernating Indiana bats within the area expected to be impacted by the project?

No

26. Are trees present within the action area?

Note: If there are trees within the action area that are of a sufficient size to be potential roosts for bats (i.e., live trees and/or snags ≥ 5 inches dbh (12.7 centimeter), answer "Yes". If you are unsure, answer "Yes." Or refer to Appendix A of the Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines for definitions and an assessment form that will assist you in determining if suitable habitat is present within your project's action area. Suitable summer habitat for Indiana bat consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥ 5 inches dbh (12.7 centimeter) that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat.

Yes

27. Has a presence/probable absence bat survey following the [Service's Range-wide Indiana Bat and Northern long-eared Bat Survey Guidelines](#) been conducted within the action area?

Yes

28. Was the survey conducted within the last 5 years?

Note: If no, your survey results are out-of-date. You can continue through the key, but the questions will assume presence of Indiana bat. If you do not wish to assume presence, contact your local Ecological Services Field Office for additional guidance.

Yes

29. Have you received confirmation from your Ecological Services Field Office that your survey results are considered valid?

Note: If NO, please contact the appropriate local Ecological Services Field Office before completing this determination key.

Yes

30. Did you coordinate with your Ecological Services Field Office in advance of your survey effort and receive authorization for the study proposal and approval of the results?

Note: If NO, please contact the appropriate local Ecological Services Field Office before completing this determination key. If you continue through the key, the questions will assume presence of Indiana bat.

Yes

SUBMITTED DOCUMENTS

- *USFWS Concurrence Email to PWE_12102025.pdf* <https://ipac.ecosphere.fws.gov/project/ACTHF5VX5BGV7IFO5P42UFQH7I/projectDocuments/174033155>

31. Did survey results demonstrate the probable absence of Indiana bats?

Yes

32. Does the project intersect the Small-anthered bittercress species list area?

Automatically answered

No

33. Does the project intersect the Smooth Coneflower species list area?

Automatically answered

No

34. Do you have any other documents that you want to include with this submission?

No

PROJECT QUESTIONNAIRE

1. Approximately how many acres of trees would the proposed project remove?
24.9
2. Approximately how many total acres of disturbance are within the disturbance/
construction limits of the proposed project?
110.8
3. Briefly describe the habitat within the construction/disturbance limits of the project site.
Existing rights-of-way, agricultural and fallow fields, and forested areas.

IPAC USER CONTACT INFORMATION

Agency: Civil & Environmental Consultants, Inc.

Name: Paul Kanouff

Address: 4350 Northern Pike, Suite 141

City: Monroeville

State: PA

Zip: 15146

Email: pkanouff@cecinc.com

Phone: 7243275200

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Army Corps of Engineers